

CHEVY CHASE, BARNABY WOODS, HAWTHORNE

COMMISSIONERS

3/4 G-01 - Abraham Clayman, Secretary 3/4 G-02 - Chanda Tuck-Garfield, Treasurer

3/4 G-03 - Randy Speck, Chair 3/4 G-04 - Rebecca Maydak

3/4 G-05 - Gerald Malitz 3/4 G-06 - Dan Bradfield

3/4 G-07 - Christopher Fromboluti, Vice-Chair

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ANC3/4G Resolution Regarding the Comprehensive Plan Amendments Act of 2019 (B23-0001)

- 1. On March 20, 2018, the Commission testified before the District of Columbia Council's Committee of the Whole on the Office of Planning's proposed Framework Element of the Comprehensive Plan. That testimony focused on two problems with the Office of Planning's draft: (1) it relied on vague or inconsistent prediction models and assumptions, resulting in unreliable, biased population growth conclusions; and (2) it abandoned the certainty that must be the hallmark for an effective Comprehensive Plan and created unacceptable ambiguity that will harm residents.
- 2. On July 2, 2019, Chair Mendelson released the Council Staff's revisions to the Framework Element of the Comprehensive Plan (http://chairmanmendelson.com/2019/07/02/staff-draft-of-comp-plan-framework/). On July 9, 2019 only one week after the staff's revisions were made public the Council passed these revisions, with certain amendments, on the first vote (http://lims.dccouncil.us/Legislation/B23-0001?FromSearchResults=true). The Council's second vote may be taken when it returns from recess in September, 2019.
- 3. The Council's revisions addressed many of our Commission's concerns with respect to the certainty that the Comprehensive Plan should provide. The new revisions retain much of the Comprehensive Plan's original language and eliminate some of the "flexibility" that the Office of Planning had inserted. While this revision does not go as far as we proposed in restoring the directives in the

- Comprehensive Plan, it is a significant improvement over the Office of Planning's proposal, and the Commission commends the Council for making those changes.
- 4. With respect to the Commission's concern about the Office of Planning's population growth methodology and projections, the Council's revisions continue to use a "supply-side" theory to predict a population in the District of about 990,000 by 2045. That overly simplistic approach drives the entire Comprehensive Plan to promote aggressive development.
- 5. Importantly, this population growth projection does not consider the impact that such an expansion would have on the District's infrastructure and livability. If the Council truly expects a 40% increase in population by 2045, the Commission urges the Council to include in the Framework Element provisions for commensurate increases in available schools, parks, libraries, recreation/community centers, and the transportation infrastructure. Without comprehensive planning for those elements, either the growth will not happen as expected or the quality of life in the District will deteriorate.
- 6. Given the very short time between the release of the Staff's Framework Element revisions and the Council's adoption on first reading, the Commission does not take a position on the other Comprehensive Plan changes. The Commission joins others, however, in urging the Council to provide a realistic opportunity for comments before finally adopting this key planning roadmap for the District's future.

Approved by ANC3/4G after a discussion at its regularly scheduled and noticed July 22, 2019 meeting by a vote of 6 to 0 (a quorum being 4).

Randy Speak Phair

Abraham Clayman, Secretary



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ANC 3/4G Resolution

Requesting that the Office of Planning Address Lighting Pollution Directly in the Comprehensive Plan Amendments

- 1. ANC 3/4G has a long-standing interest in the effect of street lighting on the health, safety, and well-being of the community. In 2014, the Commission created an LED Alley/Street Light Task Force to better understand the District's plans and to provide a communication channel to the many residents who had expressed interest and concern about proposed new lighting's color and brightness. More recently, the Commission has deferred to the Mayor's Streetlight Advisory Panel and its members to represent our residents' interests.
- 2. The Commission shares the concerns expressed by Laura Phinizy, our Street Light Task Force Co-Chair and member of the Mayor's Streetlight Advisory Panel (the "Panel"), along with Delores Bushong, the Founder of the DC Streetlight Task Force and a member of the Mayors Streetlight advisory Panel, and Bonnie Garrity of the citywide Streetlight Task Force with the Office of Planning's (OP's) proposed amendments to the Comprehensive Plan's Environmental Protection Element (http://bit.ly/2UspxG1) as it relates to light pollution.² The Commission concurs in the requests made by these members of the Panel and citywide Streetlight Task Force for the following changes to the draft amendments.
- 3. Light pollution warrants its own category in the Environmental Protection Element, just as Controlling Noise (Section E-54.3), Managing Hazardous

¹ See ANC 3/4G January 13, 2014 Meeting Minutes, available at http://bit.ly/31ms1ab.

² See Comments about Draft Comprehensive Plan: Environmental Elements/Light Pollution, submitted by Delores Bushong, Bonnie Garrity, and Laura Phinizy, December 12, 2019.

Substances and Materials (Section E-54.4), and Reducing Water Pollution (Section E-54.2) have dedicated sections. Light pollution is mentioned in Section E-54.7, Other Hazards and Pollutants, and Section E-54.7.3, but those separated sections overlap and may be confusing. As the Panel members described in their comments, light pollution is a significant problem that should be highlighted in the Comprehensive Plan with a separate section on Controlling Light Pollution.

- 4. The Commission also joins the Panel members in asking that OP include the following provisions in the Environmental Protection element in a section on Controlling Light Pollution:
 - 624.1 Light has both beneficial and detrimental impacts on residents in the city. LED lights are the most recent light technology and are highly efficient in providing light using less wattage, which conserves energy and results in a significant cost savings. They also last longer than the incandescent, florescent, or high-pressure sodium lights that we have used in the past and require less maintenance. Appropriate lighting provides safety and a sense of security. However, with these benefits come challenges for the city. Excessive lighting affects the general health and well-being of District residents.
 - Outdoor lighting often surpasses the boundaries where it was meant to provide illumination. Light pollution can result from the combined illumination from streetlights, public buildings, businesses, and private homes. Excessive light levels at night can be detrimental to health and the enjoyment of a person's property. Where lighting is required or desired, steps can be taken to use energy efficient LED lights to provide the correct amount of lighting for the desired purpose and direct the lighting appropriately. With proper design and installation, warm temperature LED lights can deliver quality lighting that illuminates our streets adequately without negatively impacting health or the environment.
 - 624.3 Policy E-4.7.1: Protecting Human Health. The District shall control light trespass onto private property, shall work to curb excessive levels of light, and shall choose the warmest color of light that is feasible in order to minimize the negative impacts of outdoor lighting on human health.
 - 624.2 Policy E-4.7.2: Protecting Wildlife. Excessive lighting can also harm urban wildlife. Consistent with the goals of Sustainable DC, maintain regulations for outdoor lighting to lessen harm to wildlife, particularly migratory birds and pollinators.
 - 624.3 Policy E-4.7.3: Reduce Sky Glow. Ensure that the US Naval Observatory can meet its operational needs related to national security by choosing low color temperature of LEDs (less than 2700 Kelvin), reducing light levels to

closely follow Illuminating Engineering Society's recommendations, dim or turn off light when not needed, and promoting use of vegetation throughout the city.

- 624.4 Action E-4.7.A: Managing Light Pollution. Continue to evaluate light pollution levels to identify possible regulatory and programmatic improvements, including increased education and outreach. Study the possibility of adopting features of the Model Lighting Ordinance endorsed by both the Illuminating Engineering Society and the International Dark Sky Association.
- 624.5 Action E-4.7.B: Evaluation of Light Pollution. Continue to evaluate the District's light pollution control measures to identify possible regulatory and programmatic improvements, including increased education and outreach on light standards and requirements.
- 624.6 Action E-4.7.C.: Enforcement of Light Regulations. Pursuant to the DC Municipal Regulations enforce regulations pertaining to light trespass onto residential property.
- 624.7 Action E-4.7.D: Measuring Light Pollution. Require evaluation of light impacts and light exposure when large-scale development is proposed, and when capital improvements and transportation facility changes are proposed.

Approved by ANC 3/4G after a discussion at its regularly scheduled and noticed February 10, 2020 meeting by a vote of 6 to 0 (a quorum being 4).

Randy Speck, Chair

Abe Clayman, Secretary

cc: Andrew Trueblood, Director, Office of Planning

Council Chair Phil Mendelson

Councilmember Mary Cheh

Councilmember Brandon Todd

Councilmember Robert White

Councilmember Elissa Silverman

Councilmember David Grasso

Councilmember Anita Bonds



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ANC 3/4G Resolution Requesting Changes to the Office of Planning's Proposed Amendments to the Comprehensive Plan

- 1. At its October 28, 2019 meeting, the Commission created a Comprehensive Plan Task Force (http://bit.ly/373tRj1). The Task Force which included four commissioners and seven constituents, including one small-business owner was asked to make proposals for Commission comments on and requested changes to the Office of Planning's (OP's) recommended amendments to the District's Comprehensive Plan (https://plandc.dc.gov).
- 2. The Task Force held public meetings on November 12, 2019, November 21, 2019, December 2, 2019, December 16, 2019, and January 23, 2019. It also conducted an on-line survey with 682 respondents between December 2, 2019, and December 20, 2019, of residents in the ANC to obtain their views about issues raised by the proposed Comprehensive Plan amendments. Based on public input and Task Force members' research and analysis, the Task Force prepared a Report and Recommendations (the "Report," available at http://bit.ly/2RV5mPi).
- 3. The Commission discussed the Report at its regularly scheduled and noticed public meetings on January 27, 2020, and February 10, 2020. Based on its review and discussion of the findings, conclusions, and recommendations in the Report, the Commission generally adopts it as the basis for its comments on and requested

changes to OP's proposed amendments.¹ This Resolution summarizes the most significant points and advice for changes that OP should make before sending the amendments to the Council. The Commission relies on the entire Report, however, as the basis for its comments and asks that OP consider the full Report as part of this resolution.

- 4. The Commission particularly emphasizes three key elements of the Report:
 - Our community needs more affordable housing that will promote income diversity and enrich our civic life;
 - Our neighborhood can and should accommodate population growth while also preserving its hallmark livability and assuring that new development has a compatible scale, function, and character with the surrounding structures; and
 - Our residents require increased infrastructure planning especially for public schools and transportation that specifies how the District will meet demands for the current and future population.
- 5. OP's proposed amendments will not further these objectives as effectively as the Commission believes is essential in the Comprehensive Plan.
 - While addressing affordable housing extensively, OP's changes are not likely to accomplish their target goals, are not tailored to the needs of our neighborhood, and will not provide a significant number of new affordable housing units without more focused, specific plans;
 - OP's blanket increases to the density designations along Connecticut Avenue, NW from Chevy Chase Circle to Livingston Street, NW the Chevy Chase Gateway² do not provide adequate guidance or specificity and will not give the community adequate input on questions of compatibility, scale, and character nor will OP's changes create a memorable entrance to the city that establishes the identity of the District;

¹ The only significant difference between the Task Force Report and the Commission's resolution relates to OP's proposal to increase the density classification on the Future Land Use Map (FLUM) along the Connecticut Avenue corridor. The Task Force Report states (at page 1) that "the Comprehensive Plan should not open the door to any action by the Zoning Commission for proposed changes along the Chevy Chase Gateway to the District without first completing a thorough, detailed 'Small Area Plan" The Commission Resolution (at paragraph 9) "supports OP's proposed changes" to the FLUM but "asks, however, that OP include a provision in the Comprehensive Plan that the Zoning Commission may not approve any proposed density changes until completion of a Small Area Plan."

² The Chevy Chase Gateway is the area along Connecticut Avenue, NW from Chevy Chase Circle to Livingston Street, NW.

- OP does not provide a plan for where new schools will be located to serve our neighborhood or how those schools will be funded to alleviate the already overcrowded elementary, middle, and high school facilities west of Rock Creek and to accommodate reasonable growth; and
- OP has not accounted for current proposals that would eliminate some bus routes, remove some bus stops, and change the layout of Connecticut Avenue. These proposals, if implemented, could impact development and population growth and need to be considered in plans for the Chevy Chase Gateway.
- 6. The Commission urges OP to make the specific changes to its proposed amendments in paragraphs 7 through 16 below. Most importantly, the Comprehensive Plan should mandate a Small Area Plan for the Chevy Chase Gateway. Such a plan is particularly appropriate because the Chevy Chase Gateway requires more focused direction than can be provided by the Comprehensive Plan, and a Small Area Plan, approved by the Council, will help guide long-range development, improve our neighborhood, achieve citywide goals, and attain economic and community benefits.³ The Commission is committed to working with the community and OP to complete the Chevy Chase Gateway Small Area Plan expeditiously so that any new development can be guided by this vision.
- 7. To achieve the objectives outlined in the Report, the Commission asks OP to change the Generalized Policy Map (GPM) (http://bit.ly/34T2eYl) to designate the Chevy Chase Gateway as a Future Planning Analysis Area where

anticipated future planning efforts will be undertaken in the near term (1-5 years) to analyze land use and policy impacts, mitigate and incorporate anticipated growth, and help inform any significant zoning changes. The process should evaluate current infrastructure and utility capacity against the full build out and projected population growth, and include issues most relevant to the community that can be effectively addressed through a neighborhood planning process.⁴

8. OP should expressly identify the Chevy Chase Gateway as an important entrance to the District and change Map 9-12 in the Urban Design Element (http://bit.ly/2GnM0vD) at page 28 to include the Chevy Chase Gateway. The Rock Creek West Area Element (http://bit.ly/2JCgwnD) should also be

³ See Section 2503 of the Implementation Element (<u>http://bit.ly/2Pt5BhZ</u> at pages 5-6).

⁴ Proposed Generalized Policy Map Legend (<u>http://bit.ly/34T2eYl</u>).

changed to describe the Chevy Chase Gateway in its discussion of the Connecticut Avenue Corridor (Section 2311) and should include a policy on Chevy Chase Gateway Enhancement — for instance,

Support community-led planning for enhanced retail and housing strategies in the Chevy Chase Gateway that will grow and strengthen the local businesses, continue to attract and serve local residents with new developments of compatible scale, function, and character with the existing neighborhood, improve income diversity by expanding affordable and workforce housing,⁵ and establish a distinctive entrance to the city.

- 9. The Commission supports OP's proposed changes to the Future Land Use Map (http://bit.ly/2JBLyfk) that increase the planned density for the Chevy Chase Gateway. The Commission asks, however, that OP include a provision in the Comprehensive Plan that the Zoning Commission may not approve any proposed density changes until completion of a Small Area Plan. The Small Area Plan should be a prerequisite so that new development will be consistent with that Plan.
- 10. The Rock Creek West Area Element should be changed to require development of a Small Area Plan for the Chevy Chase Gateway that includes the following characteristics:
 - When there is construction of new mixed-use buildings e.g., at the current Safeway and Wells Fargo bank buildings they should be visually and physically compatible with existing buildings on Connecticut Avenue and should include significant affordable and workforce housing;
 - When there is new construction, it should respect the existing historic landmark structures on the west side of Connecticut Avenue (e.g., the Chevy Chase Arcade and the Avalon Theater) as well as the richness and diversity of the existing bungalows, kit houses, and other single-family houses and traditional apartment buildings in the area;
 - When there is new ground-floor retail, it should include varied pedestrian-scale facades to preserve the quality of individual, traditional "Main Street" storefronts, regardless of the building size;

⁵ The Mayor's Housing Equity Report (available at http://bit.ly/2phiFxW) uses the term "moderate-income housing" instead of "workforce housing."

- Attractive streetscapes incorporating special paving, lighting, street trees, benches, and seasonal plantings;
- Incentives that encourage the retention of neighborhood-serving retail with particular emphasis on locally owned and operated small ("mom-and-pop") businesses;
- Parking (including potentially underground) to support the commercial businesses and new residential development;
- Enhancement of the space around the Chevy Chase Public Library and the Chevy Chase Community Center to create an active public space;
- Modernization of the Chevy Chase Public Library to include mixed-use/colocation with affordable housing development;
- Green buildings with geothermal, solar, green roofs, rainwater capture, repurposed materials, etc.;
- Modernization of the bus depot site to serve as a station for a new shuttle connector to Metro, a location for local history and arts displays, retail pop-ups, potentially being incorporated into housing, etc;
- Placemaking features including public art and interpretive signage that emphasize the history of the community, including its diverse roots (e.g., as reflected in the requested name change from Lafayette Park to Lafayette-Pointer Park); and
- Ensure new affordable and workforce housing in mixed-income developments is built at a level significantly above Inclusionary Zoning and Inclusionary-Plus Zoning and that such housing is offered on a first-priority basis to teachers, librarians, first responders, caregivers, etc., who work locally and whose salaries are publicly funded (i.e., workforce housing).
- 11. The Rock Creek West Area Element should include a policy statement that encourages and facilitates creative affordable housing solutions along the Chevy Chase Gateway. While traditional Inclusionary Zoning and Inclusionary-Plus Zoning can be one tool in creating affordable housing, it is not the most effective way to achieve the District's ambitious goals in our area. The Plan should recognize this neighborhood's opportunities and limitations by stimulating partnerships and coalitions of developers non-profit and for-profit and by acknowledging the need for significant District participation through contributions of its own resources (e.g., through the Housing Production Trust Fund or making public property available for affordable housing). The District's policy for the Chevy Chase Gateway should be to use any value created by allowing greater density as an asset to ensure the fullest achievement of affordable housing objectives.

- 12. The Rock Creek West Area Element should include a policy that encourages development of affordable and workforce housing that is suitable for families and that is fully accessible to those with disabilities. The policy should also encourage and support development of resident-owned affordable and workforce housing so that residents retain a portion of the appreciation in value, but covenants should require that the units remain "affordable" for at least 15 years.
- 13. The Rock Creek West Area Element should include a policy that the District will use its publicly-owned property at the Chevy Chase Public Library for future development of a new library that also includes mixed-income housing, with emphasis on affordable and workforce housing and on housing for public employees (e.g., first responders, librarians, and teachers).
- 14. The Rock Creek West Area Element should include a policy to preserve rent-controlled units so that they are not redeveloped in a way that reduces the stock of housing that is effectively "affordable" even if not defined as such in order to create the false impression of having created additional units that are expressly income-restricted. The result of moving existing affordable housing from one column to another with no net gain means displacing one set of vulnerable residents for a more vulnerable group. Conversions of rent-controlled units are likely to take the pressure off building new affordable units, but achieve no real gain.
- OP should restore the deleted section in the Rock Creek West Area Element that describes "Development Priorities," including such issues as parking, schools, trees, and recreation facilities (Rock Creek West Area Element at pages 13-17). Residents identified those priorities in 2006, and the Commission's survey of our community demonstrates that they remain important development priorities. Our residents priorities continue to be new development that is compatible with existing buildings, reducing traffic congestion, improving pedestrian safety, expanding commercial and residential parking, addressing overcrowding at public schools, and increasing affordable housing. While these priorities may be discussed elsewhere in the Comprehensive Plan, they continue to be important planning considerations for this community. Failure to consider them expressly in the Rock Creek West Area Element, while simultaneously proposing increased density in the Chevy Chase Gateway, would be imprudent.
- 16. The Rock Creek West Area Element should include a policy that addresses the need for infrastructure e.g., transportation, parks and recreation, libraries, utilities, and schools that accommodates projected population growth. In particular, this Element must include a policy to create a specific plan for where, when, and how the District will locate, build, and fund public schools for the

children in the Wilson High School Feeder Pattern so that new development and population growth will not exacerbate current school overcrowding. Rock Creek West is already confronting a crisis in school facility shortage, but the proposed Plan amendments do not specifically address where school capacity can be located or how it will be funded. It would be imprudent to proceed with the Plan's growth scenario while neglecting to address the hard questions about public schools and other necessary infrastructure.

17. The Commission urges OP to make these changes to its proposed amendments and to work with this Commission to implement the Chevy Chase Gateway Small Area Plan and the other policy provisions that we propose. The Commission and this community can be effective partners with OP to achieve the Comprehensive Plan's ambitious goals while maintaining and enhancing the livability and vitality of the Chevy Chase Gateway neighborhood.

Approved by ANC 3/4G after a discussion at its regularly scheduled and noticed

February 10, 2020 meeting by a vote of 6 to 0 (a quorum being 4).

Randy Speck, Chair

Abe Clayman, Secretary

cc: Andrew Trueblood, Director, Office of Planning

Council Chair Phil Mendelson

Councilmember Mary Cheh

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ANC 3/4G Resolution Requesting Additional Time for Comments on Amendments to The Comprehensive Plan Citywide and Area Elements

- 1. The Comprehensive Plan is a 20-year framework that guides the District's future growth and development. Originally adopted in 2006 and amended in 2011, it addresses a wide range of topics, including land use, economic development, housing, environmental protection, historic preservation, and transportation.
- 2. The District is in the midst of considering another amendment to the Plan. The DC Office of Planning (OP) has developed proposed amendments based on comments from residents, developers, and its staff. Once those recommendations are finalized, they will go to the Council for its consideration. The Council may hold hearings and make changes to OP's proposed amendments.
- 3. The Comprehensive Plan consists of four major components: (a) the Framework Element provides the context for the rest of the Plan by describing changes in demographics, economics, technology, and finances and includes growth forecasts and projections to show how and where the District expects to add households, people, and jobs through 2045; (b) the City-wide Elements describe the vision for the District's future in terms of land use, economic development, housing, arts and culture, environmental protection, transportation, community services and facilities, educational facilities, urban design, historic preservation, infrastructure (e.g., utilities), and parks, recreation, and open space; (c) on an aggregate level, the Plan includes a Future Land Use Map (FLUM) and a Generalized Policy Map (GPM) that are to be used as "a generalized guide for development and conservation decisions"; and (d) the Area Elements focus on planning for particular parts of the city, e.g., the Rock Creek West Area for ANC 3/4G.

- 4. The Office of Planning submitted the Framework Element to the Council in January 2018. The Council held a marathon hearing on this Element on March 20, 2018, and the Commission submitted testimony (http://bit.ly/2MSuCD8) urging the Council to address two concerns (1) by modifying OP's population growth projections to account for factors that will diminish unbridled growth and to preserve neighborhoods and communities, and (2) by eliminating OP's unnecessary and counterproductive attempts to dilute the Comprehensive Plan with so-called "flexibility."
- 5. On July 2, 2019, the Council released a number of changes to OPs proposed Framework Element and passed it on first reading on July 9, 2019. On July 22, 2019, the Commission adopted a resolution (http://bit.ly/2pkWKGe) acknowledging some appropriate revisions and significant improvements in the Council's changes over OP's proposal. The Commission reiterated its concern, however, about OP's population growth methodology and projections and its failure to consider the impact that such a population expansion would have on the District's infrastructure and livability. The Commission also objected to the short time between the Council's changes and its adoption on first reading. On October 8, 2019, the Council passed the Framework Element (http://bit.ly/2pb6LWB).
- 6. On October 15, 2019, OP released its proposed amendments to the remaining elements of the Comprehensive Plan. The full draft Comprehensive Plan is available at https://plandc.dc.gov, and the summary of the plan for Rock Creek West is at https://bit.ly/36gFgLM. OP is holding public meetings in each ward to discuss its proposal and answer questions. Director Donaldson from the Department of Housing and Community Development and Director Trueblood from OP have also agreed to attend the ANC's December 9, 2019 meeting to answer the community's questions.
- 7. The 13 Citywide Elements and ten Area Elements total more than 1500 pages of proposed changes as well as nearly 200 proposed changes to the FLUM and GPM maps. The proposed amendments make major changes to the existing elements, striking out large portions of text and adding large sections of new text.
- 8. OP requires any individual comments on the proposed amendments to be submitted by December 20, 2019. It suggests, however, that individuals or groups submit comments to their ANC by December 20, 2019, for incorporation into the ANCs' resolutions that must be submitted by January 31, 2020.
- 9. On October 28, 2019, the Commission created a Comprehensive Plan Task Force that includes commissioners, residents, and local business representatives. The Task Force has begun working through the Comprehensive Plan as it affects our ANC and has held two public meetings. It has two more public meetings scheduled for December. The Task Force also plans to conduct a survey of

residents to gather data about what the community wants in the Comprehensive Plan.

- 10. Council Chairman Mendelson has stated that Council will not consider these proposed amendments until after passage of the District's FY 2021 budget in June, 2020. The Council is expected to hold public hearings on the OP's proposed changes to the Comprehensive Plan and, if its actions on the Framework Element are indicative, it may take several months to pass a final version of the amended Plan.
- 11. Given the importance of the Comprehensive Plan for the District and individual communities and the volume and complexity of OP's proposed changes, residents and ANCs should be given more time to analyze the impact of the changes and to propose modifications. There is no urgency that compels the schedule that OP has set.
- 12. The Commission urges Mayor Bowser, Council Chair Mendelson, and Office of Planning Director Trueblood to provide at least another 60 days for submission of comments on the proposed Comprehensive Plan amendments i.e., for comments from individuals to be submitted by February 20, 2020, and for resolutions from ANCs to be submitted by March 31, 2020. OP can then submit its final proposed Comprehensive Plan amendments to the Council by the end of May 2020. This schedule should not materially delay the Council's consideration and action on the Plan since it will be occupied with the FY 2021 budget until early June.

Approved by ANC 3/4G after a discussion at its regularly scheduled and noticed November 25, 2019 meeting by a vote of 5 to 0 (a quorum being 4).

Randy Speck, Chair

Abe Clavman, Secretary

cc: Mayor Muriel Bowser

Council Chair Mendelson

Office of Planning Director Andrew Trueblood